



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live.

Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

April 6, 2004

100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.in.gov/idem

TO: Interested Parties / Applicant

RE: SCA North America Packaging Division / 091-18628-00079

FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-17-3-4 and 326 IAC 2, this approval is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-7-3 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice.** The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for considerations at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures
FNPER-MOD.dot 9/16/03

April 6, 2004

Mr. Robert Niklewicz
SCA North America Packaging Division
P. O. Box 448
New Brighton, PA 15066

Re: 091-18628
Minor Source Modification to:
Part 70 permit No.: T091-7666-00079

Dear Mr. Niklewicz:

SCA North America Packaging Division was issued Part 70 operating permit T091-7666-00079 on October 14, 1999, for a polystyrene shape molding operation. An application to modify the source was received on March 5, 2004. Pursuant to 326 IAC 2-7-10.5 the following emission units are approved for construction at the source:

- (1) Five (5) Kurtz molding presses, constructed in 2004, with a total rated capacity of 2100 pounds per hour, exhausting to an undetermined stack.
- (2) Thirteen (13) pre-puff storage silos, each with storage capacity of 972 pounds.

The following construction conditions are applicable to the proposed project:

1. General Construction Conditions
The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).
2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.
3. Effective Date of the Permit
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.
4. Pursuant to 326 IAC 2-1.1-9 and 326 IAC 2-7-10.5(i), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.
5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

6. Pursuant to 326 IAC 2-7-10.5(l) the emission units constructed under this approval shall not be placed into operation prior to revision of the source's Part 70 Operating Permit to incorporate the required operation conditions. Pursuant to 326 IAC 2-7-12(b)(7), the source may make the change proposed in its minor Part 70 permit modification immediately after it files such application, if the application meets the requirements of 326 IAC 2-7-12(b)(3).

The source may begin construction when the minor source modification has been issued. Operating conditions shall be incorporated into the Part 70 operating permit as a minor permit modification in accordance with 326 IAC 2-7-10.5(l)(2) and 326 IAC 2-7-12.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter call (800) 451-6027, press 0, extension 3-0868, or dial (317) 233-0868.

Sincerely,

Original signed by Paul Dubenetzky

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments

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cc: File - LaPorte County
LaPorte County Health Department
Northwest Regional Office
Air Compliance Section Inspector – Rick Massoels
Compliance Data Section
Administrative and Development

PART 70 MINOR SOURCE MODIFICATION

OFFICE OF AIR QUALITY

**SCA North America Packaging Division
955 Woodland Avenue
Michigan City, Indiana 46360**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T091-7666-00079	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date: October 14, 1999 Expiration Date: October 14, 2004

Minor Source Modification No.: 091-18628	Pages Affected: 7, 29, 31
Issued by: Original signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: April 6, 2004

- 28) One (1) molding press, model number 68, identified as P001, rated at 150 pounds per hour, and exhausting to stack S-33.
- 29) Sixteen (16) post expansion storage silos, identified as F28, each with a total maximum storage capacity of 972 pounds.
- 30) Two (2) molding presses, model type Kurtz K813, identified as MP28 and PM29, each rated at 150 pounds per hour;
- 31) Five (5) Kurtz molding presses, constructed in 2004, with a total rated capacity of 2600 pounds per hour, exhausting to an undetermined stack.
- 32) One (1) Hirsch 6000 polystyrene pre-expander, identified as PE4, rated at 1500 pounds per hour and exhausting at stack S-36.
- 33) Thirteen (13) pre-puff storage silos, each with storage capacity of 972 pounds.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
[326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- 1) One (1) boiler, model number CB 700-200, fueled by natural gas, heat input rate is 8.4 MMBtu per hour and exhausting to stack S-2.
- 2) Welding operations consisting of the following equipment:
 - (a) Miller matic wire welder, identified as MS-1;
 - (b) Small torch, identified as MS-2;
 - (c) Dialarc stick welder, identified as MS-3;
 - (d) Dialarc stick welder, identified as MS-4;
 - (e) Miller matic wire welder, identified as MS-5;
 - (f) Medium torch, identified as MS-6;
 - (g) Miller matic wire welder, identified as MS-7;
 - (h) Medium torch set, identified as MS-8;
 - (i) Dialarc stick welder, identified as MS-9; and
 - (j) Medium torch set, identified as MS-10.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22).
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

One (1) molding press, model number 68, rated at 150 pounds per hour, and exhausting to stack S-21.

One (1) molding press, model number BR 620, rated at 100 pounds per hour, and exhausting to stack S-23.

One (1) molding press, model number BR 620, rated at 100 pounds per hour, and exhausting to stack S-24.

One (1) molding press, model number BR 620, rated at 100 pounds per hour, and exhausting to stack S-25.

One (1) molding press, model number BR 620, rated at 100 pounds per hour, and exhausting to stack S-26.

One (1) molding press, model number BR 620, rated at 100 pounds per hour, and exhausting to stack S-27.

One (1) molding press, model number 1317, identified as P001, rated at 600 pounds per hour, and exhausting to stack S-28.

One (1) molding press, model number 813, identified as P001, rated at 300 pounds per hour, and exhausting to stack S-29.

One (1) molding press, model number 68, identified as P001, rated at 150 pounds per hour, and exhausting to stack S-30.

One (1) molding press, model number 68, identified as P001, rated at 150 pounds per hour, and exhausting to stack S-31.

One (1) molding press, model number 68, identified as P001, rated at 150 pounds per hour, and exhausting to stack S-32.

One (1) molding press, model number 68, identified as P001, rated at 150 pounds per hour, and exhausting to stack S-33.

Sixteen (16) post expansion storage silos, identified as F28, each with a total maximum storage capacity of 972 pounds.

Two (2) molding presses, model type Kurtz K813, identified as MP28 and PM29, each rated at 150 pounds per hour.

Five (5) Kurtz molding presses, constructed in 2004, with a total rated capacity of 2600 pounds per hour, exhausting to an undetermined stack.

One (1) Hirsch 6000 polystyrene pre-expander, identified as PE4, rated at 1500 pounds per hour and exhausting at stack S-36.

Thirteen (13) pre-puff storage silos, each with storage capacity of 972 pounds.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

- (c) The Permittee shall continuously search for material with lower pentane and VOC content. The applicant shall submit an annual report within 30 days of January 1 describing the search conducted during the past twelve (12) months, results of the previous year's search, and schedule of switching to material with lower pentane and VOC content if the material is available. Compliance with this condition will fulfill the requests of 326 IAC 8-1-6.

D.2.5 Volatile Organic Compounds (VOC) [326 IAC 2-7-10.5] [326 IAC 8-1-6]

Any change or modification that will cause VOC emissions from the molding press identified as P001, to be equal to or greater than 25 tons per year shall require IDEM, OAM approval before such changes can take place.

D.2.6 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

- (a) The total input usage of volatile organic compounds (VOC) at the pre-expander, identified as PE4, shall be limited to 103.75 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. Based on a VOC flash off factor of twenty-four percent (24%), this will limit VOC emissions to less than twenty-five (25) tons per twelve (12) consecutive month period.
- (b) Any change or modification that will cause VOC emissions from the pre-expander, identified as PE4, to be equal to or greater than twenty-five (25) tons per year shall require IDEM, OAQ approval before such changes can occur.
- (c) Any change or modification that will cause VOC emissions from any of the five (5) Kurtz molding presses (installed in 2004) to be equal to or greater than twenty-five (25) tons per year shall require IDEM, OAQ approval before such changes can occur.
- (d) Any change or modification that will cause VOC emissions from any of the thirteen (13) pre-puff storage silos (installed in 2004) to be equal to or greater than twenty-five (25) tons per year shall require IDEM, OAQ approval before such changes can occur.

This limit shall render the requirements of 326 IAC 8-1-6 (BACT) not applicable.

Compliance Determination Requirements

D.2.7 Testing Requirements [326 IAC 2-7-6(1)]

Within 90 days after issuance of Minor Permit Revision No. 091-18823-00079, the Permittee shall perform testing of the five (5) Kurtz molding presses (installed in 2004) to validate the 0.0077 lb VOC emitted/lb beads overall emission factor used to determine the VOC emissions utilizing methods as approved by the Commissioner. Testing shall be conducted in accordance with Section C-Performance Testing.

D.2.8 Record Keeping Requirements

- (a) To document compliance with Conditions D.2.1, D.2.5 and D.2.6, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.2.1 and D.2.5.
 - (1) The amount and VOC content of expandable polystyrene molding compound. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used;
 - (2) A log of the dates of use;
 - (3) The total VOC usage for each month; and
 - (4) The weight of VOCs emitted for each compliance period.

**Indiana Department of Environmental Management
Office of Air Quality**

**Technical Support Document (TSD) for a Minor Source Modification and
a Minor Permit Modification to a Part 70 Operating Permit**

Source Background and Description

Source Name:	SCA North America Packaging Division
Source Location:	955 Woodland Avenue, Michigan City, IN 46360
County:	LaPorte
SIC Code:	3086
Operation Permit No.:	T091-7666-00079
Operation Permit Issuance Date:	October 14, 1999
Source Modification No.:	091-18628
Permit Modification No.:	091-18823
Permit Reviewer:	Madhurima D. Moulik

The Office of Air Quality (OAQ) has reviewed a modification application from SCA North America Packaging Division relating to the operation of a polystyrene shape molding operation.

History

On March 5, 2004, SCA North America Packaging Division submitted an application to the OAQ requesting to add five (5) molding presses and thirteen (13) pre-puff storage silos to their existing plant. SCA North America Packaging Division was issued a Part 70 permit on October 14, 1999.

New Emission Units and Pollution Control Devices

The source consists of the following new emission units and pollution control devices:

- (1) Five (5) Kurtz molding presses, constructed in 2004, with a total rated capacity of 2600 pounds per hour, exhausting to an undetermined stack.
- (2) Thirteen (13) pre-puff storage silos, each with a storage capacity of 972 pounds.

Existing Approvals

The source was issued a Part 70 Operating Permit T091-7666-00079 on October 14, 1999. The source has since received the following:

- (a) First Administrative Amendment No. 091-11627, issued on January 18, 2000;
- (b) First Reopening No. 091-13378, issued on February 13, 2002;
- (c) Second Administrative Amendment No. 091-13602, issued on January 17, 2001;
- (d) First Significant Permit Modification No. 091-14496, November 20, 2001;
- (e) Third Administrative Amendment No.: 091- 15449, issued on March 20, 2002;
- (f) Second Significant Permit Modification No.: 091-15559, issued on July 22, 2002;
- (g) First Minor Permit Modification No.: 091-15930, issued on October 10, 2002; and
- (h) Third Significant Permit Modification No.: 091-16694, issued on July 30, 2003.

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

Stack ID	Operation	Height (ft)	Diameter (ft)	Flow Rate (acfm)	Temp (°F)
S-3	Unit B-3	30.0	2.0	3300	300-350
Drain Vent	Five New Presses	30.0	0.33	1000	160-220

Recommendation

The staff recommends to the Commissioner that the Minor Source Modification and Minor Permit Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

A complete application for the purposes of this review was received on March 5, 2004.

Emission Calculations

Total capacity of five (5) new Kurtz K813 molding presses = 2600 lb/hr.

Maximum pentane (VOC) content of material used = 5.5%

VOC loss rate from the molding press = 14% (based on loss rate used for similar presses, see TSD for Significant Source Modification No.: 091-14438)

US EPA Guidance "Control of VOC Emissions From Polystyrene Foam Manufacturing", EPA-450/3-90-020, August, 1990, establishes 15% as the overall amount retained in the final product after 48 hours. Since SCA North America Packaging Division is claiming a percent retention greater than what is established in the EPA guidance, the source will be required to perform testing to determine the overall percent pentane retained and demonstrate that the lower emission factor is valid.

$0.055 \text{ lb pentane/lb beads} \times 0.14 \text{ lb VOC emitted/lb pentane} = 0.0077 \text{ lb VOC emitted/lb beads}$

Therefore, potential to emit of **VOC**

$= 2600 \text{ lb/hr} \times 0.055 \times 0.14 \times 8760 \text{ hr/yr} \times 1 \text{ ton}/2000 \text{ lb} = \mathbf{87.7 \text{ tpy}}$

Storage Silos:

Emission factors are based on AP-42 [Table 6.6.3-3 – Emission Factors for Expandable Polystyrene, 9/95].

Storage vents loss (VOC) = 1.3 g/kg of product.

Maximum usage rate of polystyrene = 300 lb/hr

Therefore, **PTE of VOC** = $1.3 \text{ g VOC/kg} \times 300 \text{ lb/hr} \times 1 \text{ kg}/2.2 \text{ lb} = 177.3 \text{ g VOC/hr}$

$= 0.177 \text{ kg VOC/hr} \times 2.2 \text{ lb/1 kg} \times 1 \text{ ton}/2000 \text{ lb} \times 8760 \text{ hr/yr} = \mathbf{1.7 \text{ tpy}}$

Potential to Emit of the Source Modification

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated

as part of its design if the limitation is enforceable by the U.S. EPA, the department, or the appropriate local air pollution control agency.”

Pollutant	Potential to Emit (tons/yr)
PM	Negligible
PM-10	Negligible
SO ₂	Negligible
VOC	89.4
CO	Negligible
NO _x	Negligible

Justification for the Modification

The Part 70 Operating permit is being modified through a Part 70 Minor Source Modification and a Minor Permit Modification. The source modification is being performed pursuant to 326 IAC 2-7-10.5(d)(9), which states in part that a minor source modification is appropriate for modifications that “has a potential to emit greater than the thresholds under subdivision (4) that adds an emissions unit or units of the same type that are already permitted and that will comply with the same applicable requirements and permit terms and conditions as the existing emission unit or units, except if the modification would result in a potential to emit greater than the thresholds in 326 IAC 2-2 or 326 IAC 2-3”. Additionally, the Part 70 permit will be modified through a Minor Permit Modification pursuant to 326 IAC 326 IAC 2-7-12(b)(1), which states that a minor permit modification is appropriate for modifications that “do not violate any applicable requirements” and “do not involve significant changes to existing monitoring, reporting, or record keeping requirements in the Part 70 permit”.

The addition of the new molding presses and storage silos meet the above requirements. Therefore, a Minor Source Modification and a Minor Permit Modification will be issued.

County Attainment Status

The source is located in LaPorte County.

Pollutant	Status
PM-10	attainment
SO ₂	attainment
NO ₂	attainment
Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. LaPorte County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.
- (b) LaPorte County has been classified as attainment or unclassifiable for all other criteria pollutants, Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.

Federal Rule Applicability

- (a) There is no New Source Performance Standard, 326 IAC 12 (40 CFR 60) applicable to the new molding presses and storage silos.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP)(326 IAC 14, 20 and 40 CFR Part 61, 63) applicable to the new molding presses and storage silos.

State Rule Applicability – Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration)

This source is still not a major source because this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2, and the source-wide volatile organic compounds are limited to less than 250 tons per twelve consecutive month period. The source has requested that the emission limit remain unchanged after this source modification. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

All other state rule applicabilities remain unchanged.

State Rule Applicability – Individual Facilities

326 IAC 6-3-2 (Process Operations)

The five (5) new molding presses are not subject to 326 IAC 6-3-2 (Process Operations) because they do not emit any PM.

The thirteen (13) new storage silos are not subject to 326 IAC 6-3-2 (Process Operations) because they do not emit any PM.

326 IAC 8-1-6 (VOC Rules: General Reduction Requirements)

The potential VOC emissions of each of the five (5) new Kurtz molding presses are less than 25 tons per year. Therefore, 326 IAC 8-1-6 does not apply.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

There are no compliance requirements for the equipment covered under this approval.

Conclusion

This Minor Source Modification and Minor Permit Modification shall be subject to the conditions of the attached Minor Source Modification No. 091-18628 and Minor Permit Modification No. 091-18823.

CHANGES TO THE PART 70 PERMIT

(1) The facility description in sections A.2 and D.2 are modified as follows (~~strikeout~~ to show deletions and **bold** to show additions):

- (30) Two (2) molding presses, model type Kurtz K813, identified as MP28 and PM29, each rated at 150 pounds per hour;

- (31) Five (5) Kurtz molding presses, constructed in 2004, with a total rated capacity of 2600 pounds per hour, exhausting to an undetermined stack.**
- (34) One (1) Hirsch 6000 polystyrene pre-expander, identified as PE4, rated at 1500 pounds per hour and exhausting at stack S-36.**
- (33) Thirteen (13) pre-puff storage silos, each with storage capacity of 972 pounds.**

(2) Section D.2.5 is modified as follows:

D.2.6 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

- (a) The total input usage of volatile organic compounds (VOC) at the pre-expander, identified as PE4, shall be limited to 103.75 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. Based on a VOC flash off factor of twenty-four percent (24%), this will limit VOC emissions to less than twenty-five (25) tons per twelve (12) consecutive month period.
- (b) Any change or modification that will cause VOC emissions from the pre-expander, identified as to or greater than twenty-five (25) tons per year shall require IDEM, OAQ approval before such changes can occur.
- (c) Any change or modification that will cause VOC emissions from any of the five (5) Kurtz molding presses (installed in 2004) to be equal to or greater than twenty-five (25) tons per year shall require IDEM, OAQ approval before such changes can occur.**
- (d) Any change or modification that will cause VOC emissions from any of the thirteen (13) pre-puff storage silos (installed in 2004) to be equal to or greater than twenty-five (25) tons per year shall require IDEM, OAQ approval before such changes can occur.**

(3) Section D.2.7 is modified as follows:

D.2.7 Testing Requirements [326 IAC 2-7-6(1)]

~~The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC limit specified in Condition D.2.1 and D.2.2 shall be determined by a performance test conducted in accordance with Section C- Performance Testing.~~

Within 90 days after issuance of Minor Permit Revision No. 091-18823-00079, the Permittee shall perform testing of the five (5) Kurtz molding presses (installed in 2004) to validate the 0.0077 lb VOC emitted/lb beads overall emission factor used to determine the VOC emissions utilizing methods as approved by the Commissioner. Testing shall be conducted in accordance with Section C- Performance Testing.